

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-MC-20707-JEM/BECERRA

In re: Application Pursuant to
28 U.S.C. § 1782 of

FARHAD AZIMA
5921 Ward Parkway
Kansas City, Missouri 64113,

Petitioner,

v.

INSIGHT ANALYSIS AND RESEARCH, LLC
13727 SW 152 Street, #715
Miami, Florida 33177,

SDC-GADOT, LLC
3200 Collins Avenue, Suite L2
Miami Beach, Florida 33140,

and

AMIT FORLIT
5-A Habarzel Street
Tel Aviv, Israel 6971002 IL,

Respondents.

PARTIES' NOTICE OF COMPLIANCE AND STATUS UPDATE

Per the Court's request, on July 29, 2022, the parties met and conferred to discuss (a) the status of motions filed, (b) updates to provide to the Court, and (c) a mutually-agreed upon date and time for a hearing on outstanding matters. The parties' status update and positions regarding those matters are outlined below.

I. Update on this matter

In an ongoing effort to amicably resolve issues between them, the parties agreed to proceed with Rule 30(b)(6) depositions of Respondents Insight and Gadot on July 20 and 21, 2022 in Tel Aviv, Israel. The corporate representative deposed, for both entities, was Amit Forlit. Mr. Forlit brought twenty-six pages of invoices with him to the deposition, which had not been previously produced. At the depositions, Respondents renewed their objections to certain questions as being “beyond the scope” of the initial subpoenas issued, and Mr. Forlit did not answer certain questions that he deemed dealt with him personally. On several issues, Mr. Forlit was unprepared to respond substantively and, subject to the outcome of our ongoing discussions with Respondents’ counsel, Petitioner may file a motion to compel additional depositions.

II. Outstanding matters

The parties submit that the following pleadings remain outstanding and are before the Court for resolution:

a. Petitioner’s amended application for discovery of Mr. Forlit, in his personal capacity – D.E.s 23 and 24 (with related briefing at D.E.s 31 and 33). The parties have yet to resolve this issue, as Mr. Forlit maintains that the Court lacks personal jurisdiction over him. Counsel for Mr. Forlit advised that Mr. Forlit intends to supplement his pleading filed, based upon the depositions of Insight and Gadot.

b. Petitioner’s motion for sanctions and to compel discovery – D.E. 32 (related filings and/or briefing at D.E.s 27, 28, 39 and 40). The parties have yet to resolve these issues. Petitioner maintains that Respondents must produce meaningful discovery, particularly since Mr. Forlit brought documents with him to the depositions of Insight and Gadot, after proffering to the court that no such responsive materials existed. Respondents claim that they have fulfilled their

discovery obligations in D.E.s 27 and 28 (as to the documents produced) and by submitting to depositions already, rendering D.E. 32 moot. Petitioner maintains that there are outstanding responsive documents and that Respondents Insight and Gadot should submit to a second deposition on issues not fully covered. Respondents' counsel state that they will conduct a further search to ensure that no additional documents are in their custody, control and/or care.

c. Respondents' objections at D.E. 34 (and opposition thereto at D.E. 36). To the extent the Respondents' objections involve matters handled by this Court (which were not previously referred to your Honor), the parties submit that D.E. 42 renders those objections moot. However, still outstanding for the Court's review is the scope of the Petitioner's Rule 30(b)(6) depositions notices and discovery requests. Respondents submit that the scope exceeds the Court's original ruling and that Respondents Insight and Gadot do not have to provide discovery on these additional topics or areas.

III. Proposed hearing date and time

The parties propose that the Court hear oral arguments on the above issues on August 11, 2022 at 1:00 p.m. EST.

Respectfully submitted,

Dated: June 17, 2022

s/ Vanessa Singh Johannes
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Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2022, a true and correct copy of the foregoing document was filed via CM/ECF and served on counsel for the Respondents named in this matter, Christopher S. Salivar and Elan I. Baret, via such means.

s/ *Vanessa Singh Johannes*

Vanessa S. Johannes